

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE,
AT KNOXVILLE**

UNITED STATES OF AMERICA

V.

ROY ANTHONY WILLIAMS

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**NO. 3:17-CR-0098
CHIEF JUDGE VARLAN**

SENTENCING MEMORANDUM

The defendant, Roy Williams, by and through counsel, respectfully requests that the Court consider the following factors in fashioning a sentence that is sufficient, but not greater than necessary to accomplish the statutory goals of sentencing. Mr. Williams has filed a Notice of No Objections to the presentence report. [Doc. 31]. The advisory guideline range has been properly calculated as 87 to 108 months, however there is a statutory minimum mandatory term of 120 months. [PSR ¶ 69].

The 18 U.S.C. § 3553(a) Factors

Mr. Williams, a citizen of Great Britain, is 53 years old and, prior to his arrest here in September of 2017, had never been in trouble with the law. [PSR ¶ 55]. He lives on the Isle of Wight with his wife of seventeen years and has been actively involved in raising his three children and three grandsons. [PSR ¶ 60 - 61; Exhibit "A"]. His friends and family in England note that he had never been involved in any behavior similar to this before, and are hurt, puzzled and dismayed at the situation he now finds himself in.

As noted in the letter of support sent by a former colleague, [Exhibit "B"], Mr.

Williams was very active in the Salvation Army for over ten years. He was in charge of the local effort to provide breakfasts, clothing and medical care for underprivileged men in the community and he led the worship services there. He participated regularly in their other programs as well and was in line to take on the responsibilities of an officer. He was well-respected in his community and, as noted in the letter, “had a reputation as a committed family man and a hard-working builder.”

Unlike so many of the people who come before the Court, Mr. Williams has no history of drug or alcohol abuse, nor does he suffer any serious physical conditions. [PSR ¶ 62, 64]. He has, however, suffered from depression in the past, and as noted by the letter of support, it clearly played a role in his current problems. [PSR ¶¶ 63; Ex. “B”]. Looking back, Mr. Williams believes his decision to become active on social media and talk himself into traveling to America was the result of his increasing depression and a mid-life crisis.

Mr. Williams completed his secondary education in England when he was just fifteen and immediately went to work. [PSR ¶ 65]. Over the years, he continued his education by taking many, many vocational education classes. He worked for Federal Express for fifteen years, working his way up from the bottom to a position as logistics manager. At the age of 30, he was “head hunted” by the Target Worldwide Express Company, and accepted a position as their international logistics manager. After five years at Target, he and his wife went into business for themselves, doing the same type of work. When their main client went bankrupt, however, they decided to start over on the Isle of Wight, where they could slow down and spend more time with their families. In 2005, they started their own construction company and ran it together until Mr.

Williams' arrest last year. [PSR ¶ 66].

Mr. Williams deeply regrets his actions. He has fully accepted responsibility and punishment for his actions. His guideline range is actually less than the mandatory minimum required sentence, and he asks the Court to grant him a sentence of 120 months. In addition to his loss of freedom, he has lost his family, his business and his reputation, and he blames no one but himself. He will be deported to England when his term of incarceration is complete and is unsure how he will be received there. He asks the Court to limit any term of supervised release to five years.

Conclusion

Mr. Williams respectfully requests that the Court sentence him to a term of imprisonment of 120 months.

Respectfully submitted this 23rd day of July, 2018.

FEDERAL DEFENDER SERVICES
OF EASTERN TENNESSEE, INC.

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CERTIFICATE OF SERVICE

I hereby certify that on July 23, 2018, a copy of the foregoing Sentencing Memorandum was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's electronic filing system.

s/ Paula R. Voss